

Received by S. PARKER
on 20 JUN 88

C O P L E Y R E A L E S T A T E A D V I S O R S

399 BOYLSTON STREET BOSTON MASSACHUSETTS 02116 617 578 1200

PETER P TWINING VICE PRESIDENT & COUNSEL

June 16, 1988

LOGGED IN

FEDERAL EXPRESS

Steven L. Parker
Assistant Regional Counsel
U.S. Environmental Protection Agency
1445 Ross Avenue
Dallas, TX 75202-2733



Re: 7198 Mykawa Road, Houston, Texas
1046 Lockwood Drive, Houston, Texas

Dear Steven:

This letter is to confirm our telephone conversations on Friday, June 10th, and Tuesday, June 14th, with respect to the proposed removal actions requested by the EPA at the above-referenced addresses. I understand that you, with the help of John Meyer of the Enforcement Branch of the EPA, are preparing two separate administrative orders for these sites and that with respect to the order for International Distribution Corp. at 7198 Mykawa Road that the order will name International Distribution Corp. (formerly A-International Distribution Corp.), as tenant, and Houston Transfer & Storage, as subtenant, as well as New England Mutual Life Insurance Company, as owner. I further understand that with respect to the 1046 Lockwood Drive property that the administrative order will name Palmer Warehouse & Transfer Co., Inc., as tenant, and New England Mutual Life Insurance Company, as owner.

As we discussed, both tenants are now undertaking steps to reduce any apparent imminent threat to health or the environment in each case and to dispose of the materials at each site indemnified by the EPA. It is our understanding that these steps are being taken in coordination with Pat



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Page 2
June 16, 1988

Hammack's office. We therefore think it appropriate that the administrative orders only cover the EPA identified materials at each site at the time of the issuance of the orders. Materials disposed of prior to the issuance of the orders by the tenants (or the subtenant at the 7198 Mykawa property) will have already been removed in coordination with the EPA and therefore should be outside the scope of our responsibility under the orders.

Please note that the draft administrative orders, when available, should be sent to me at the above address on behalf of New England Mutual Life Insurance Company. I will review them and respond promptly. I appreciate the cooperative manner in which you and Pat have handled these matters. I, of course, remain available to discuss any aspect of this letter at any time.

Very truly yours,



Peter P. Twining

PPT/ap

cc: Pat Hammack - via Federal Express

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